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September 22, 2006

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: *Ex Parte* Notice of Alaska Communications Systems Group, Inc.

*Petition of ACS of Anchorage, Inc. Pursuant to Section 10 of the Communications Act of 1934, as amended (47 U.S.C. 160(c)), for Forbearance from Certain Dominant Carrier Regulation of Its Interstate Access Services, and for Forbearance from Title II Regulation of Its Broadband Services, in the Anchorage, Alaska, Incumbent Local Exchange Carrier Study Area, WC Docket No. 06-109*

Dear Ms. Dortch:

On September 21, 2006, Liane Pelletier and Leonard Steinberg of Alaska Communications Systems Group, Inc. ("ACS"), and Karen Brinkmann and Elizabeth Park of Latham and Watkins LLP, met with Angela Giancarlo and John Hunter, legal advisors to Commissioner McDowell, to discuss the above-referenced proceeding.

During the meeting, ACS described the extensive facilities-based local exchange competition in Anchorage. ACS's primary competitor, General Communication, Inc. ("GCI"), has cable and fiber facilities that are currently used, or could easily be used, to provide local exchange service to a significant number of both business and residential customers throughout Anchorage. Additionally, GCI has demonstrated that it is capable of deploying wireless local loop and microwave technology to serve residential and business customers on GCI's own facilities. Based on this extremely high level of competition in Anchorage, the Regulatory Commission of Alaska ("RCA") has adopted detariffing regulation. In its petition for non-dominant treatment, ACS seeks relief from certain federal dominant carrier regulations.

Given the significant level of current and future facilities-based competition, market forces will ensure that consumers will continue to be protected and that the public interest will be

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served after a grant of forbearance. GCI is a larger company than ACS, both in revenues and in market share. GCI has greater local exchange market share than ACS, and has a dominant position in the markets for video, broadband and long distance services. Therefore, ACS should be treated as non-dominant with respect to certain ILEC regulations in order to allow ACS to compete in Anchorage on more equal footing as GCI.

Attached are copies of materials provided to Mr. Hunter and Ms. Giancarlo at the meeting. Please contact the undersigned if you have any questions regarding this submission.

Respectfully submitted,

/s/

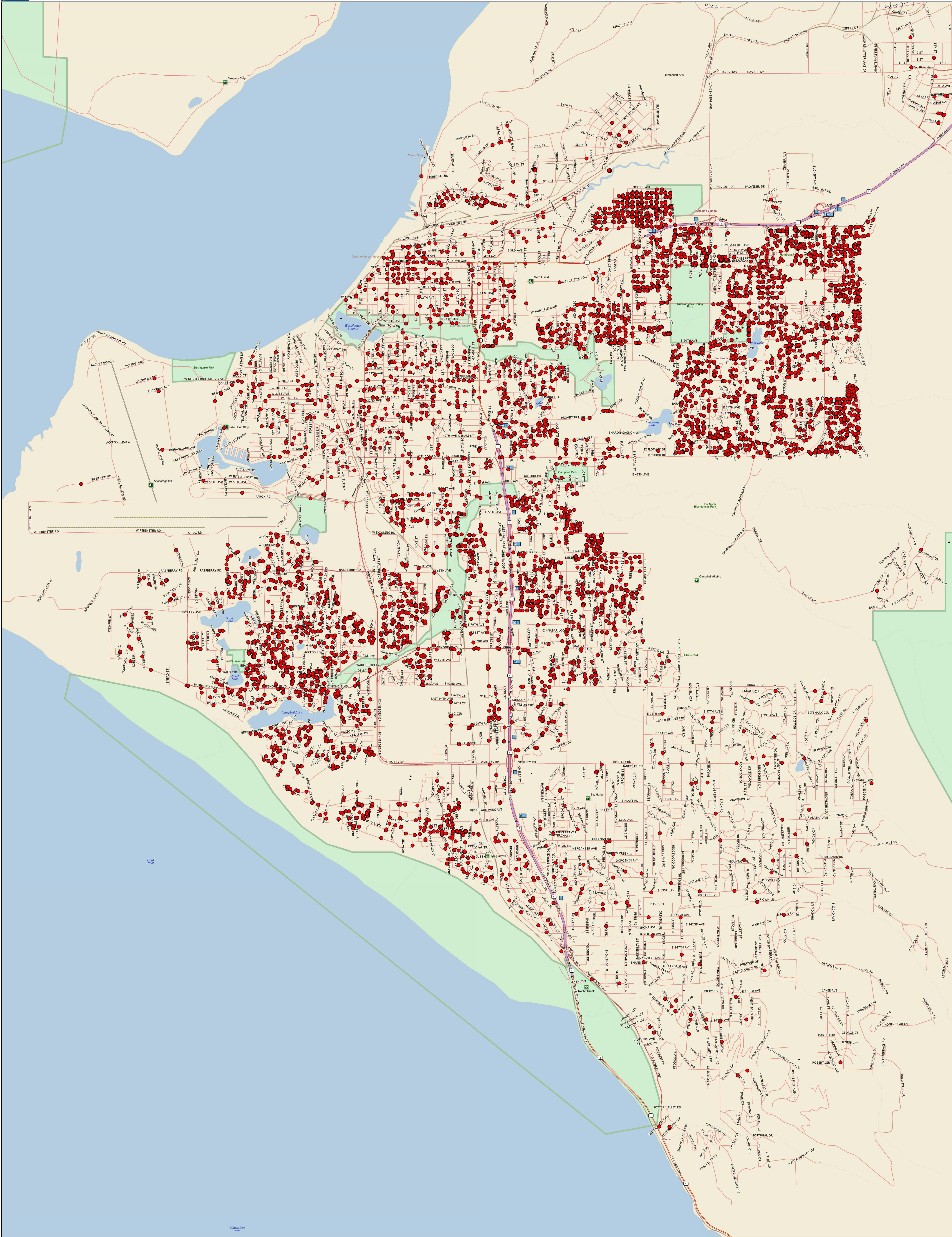
Karen Brinkmann

*Counsel to Alaska Communications Systems Group,  
Inc. and ACS of Anchorage, Inc.*

Enclosures

cc: John Hunter  
Angela Giancarlo

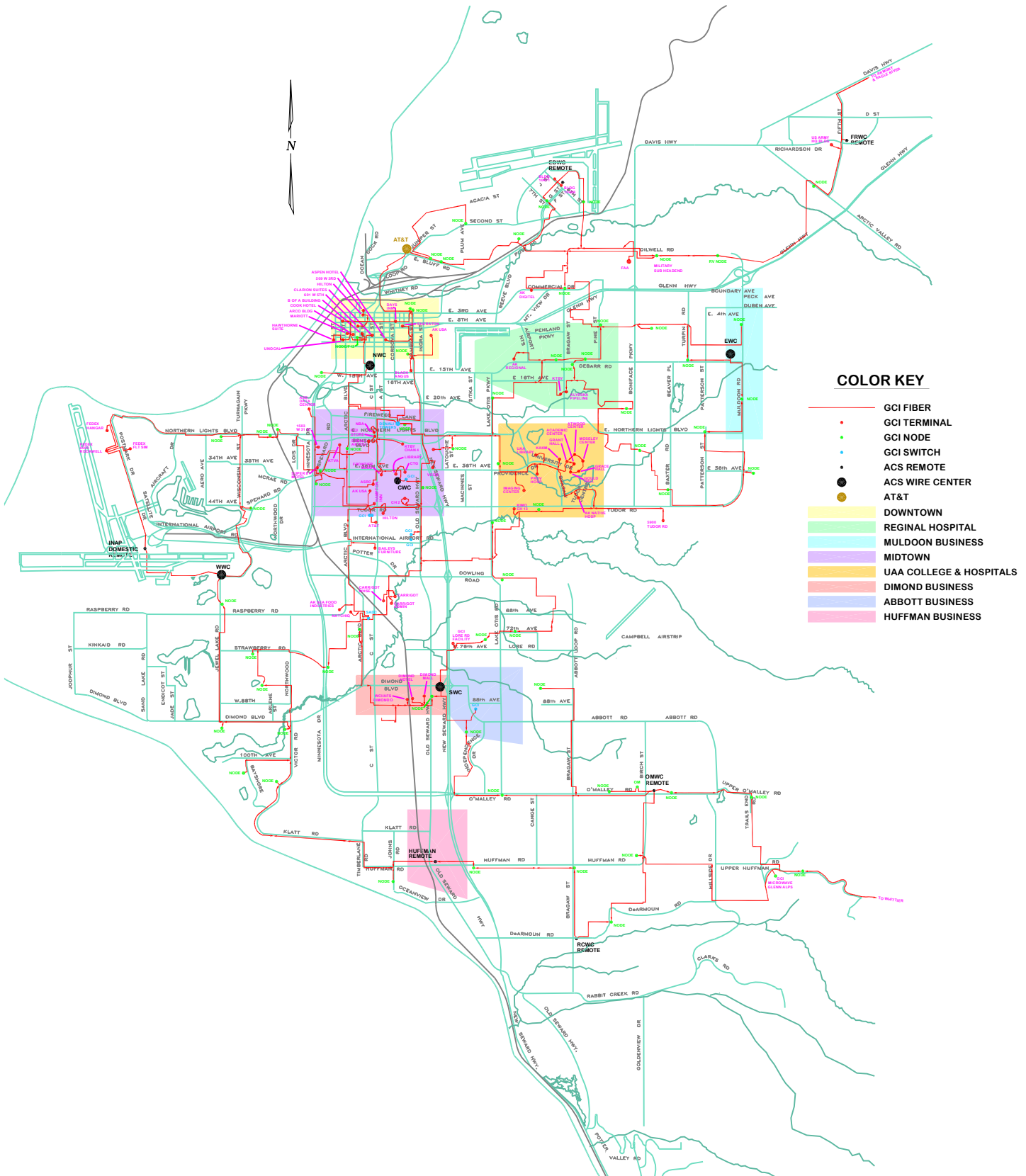






# GCI FIBER NETWORK IN ANCHORAGE

AS MAPPED BY ACS TECHNICIANS



AS MAPPED BY ACS TECHNICIANS

